REMARKS

Claims 1-22 are pending in the application. The Non-Final Office Action dated February 27, 2006 (the "OA") indicates that Claims 1-17 are allowed. Claims 20 and 22 would be allowable if rewritten in independent form. Claims 18, 19, and 21 are rejected. Claim 1 is amended to correct a typographical error. Claim 18 is amended to correct antecedent basis. No claims are amended for reasons related to patentability. Applicants submit that the claims are patentable for the reasons discussed in detail below.

Rejections under 35 U.S.C. §102

Claims 18, 19, and 21 are rejected under 35 U.S.C. 102(a) as being anticipated by Elliott (U.S. Patent No. 6,456,599, hereafter "Elliott"). Elliott is directed to "distribut[ing] some or all of the 'potential neighbor' information so that nodes in a network can perform globally optimal selections of actual neighbors from potential neighbor sets." (Elliott, col. 1, lines 60-63.) Applicant respectfully disagrees that Elliott discloses or suggests of the limitations of independent Claim 18. In general, the OA cites figures and paragraphs of Elliott as disclosing Applicant's claim limitations. The OA does not use the language of the claim limitations, and does not correlate language from Elliott with language of the claim limitations. Thus, the rejections are unclear. Nevertheless, Applicant responds to the rejections below, as Applicant interprets the OA.

Elliot discloses an invention that "extends classic link-state routing to allow full or partial distribution of 'potential,' as well as 'actual,' network topology throughout the network, and gives a basis for decentralized, distributed, or centralized algorithms to influence which such potential neighbor relationships should be upgraded to full neighbor relationships." (Elliott, col. 6, lines 15-21.) Elliot further discloses that "FIG. 9 is a flow chart illustrating a procedure of how a node determines which potential neighbors should be updated to full neighbor status." (Elliott, col. 10, lines 35-37.)

Elliot specifies that "a predetermined time is allowed to elapse (S60), and then a node formulates a beacon message (S61)." (Elliott, col. 4, lines 39-41.) Elliot also explains that a "New

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Node announces its presence by transmitting beacon messages on a broadcast channel." (Elliott, col. 4, lines 51-53.) Elliot further states that "*[a]fter* a predetermined time (S30) the node creates a 'scratch' network topology (S31) based on the Actual Neighbor Table (S32) of FIG. 5. The node then selects a subset of potential neighboring links from the Potential Neighbor Table (S34) to evaluate (S33)." (Emphasis added, Elliott, col. 10, lines 37-41.) Thus, after at least one predetermined time, the node begins the process of announcing its presence and creating a scratch topology and evaluating potential neighboring links.

The OA appears to equate one or both of Elliott's "predetermined time" to Applicant's "hold-down time." One of Applicant's claim limitations specifies that the hold-down time is applied from the network time. Elliott does not disclose or suggest that either predetermined time is applied from a network time. Thus, Elliott does not disclose or suggest a required limitation of Claim 18.

In addition, Claim 18 requires adding the new node to an admitted-node list at the network time plus the hold-down time. However, Elliot does not even begin its topology evaluations to determine whether to promote a potential node, until after Elliott's predetermined times. A node can not be added to an admitted-node list until it is fully operational and known to the other nodes. Elliott does not even begin to select a potential node until after the predetermined times have elapsed. Thus, Elliott does not disclose or suggest a required limitation of Claim 18.

Because Elliott's time periods elapse before processing begins, Elliott also does not disclose or suggest the limitation of Claim 19 wherein the hold-down time is set such that all of the nodes within the network have learned about the existence of the new node by the expiration of the hold-down time.

For the above reasons, independent Claim 18 and dependent Claim 19 are patentable. It also is well settled that dependent claims are patentable for at least the same reasons as their corresponding independent claims. Thus, rejected dependent Claims 19 and 21, and allowable dependent Claims 20 and 22 are also patentable for at least the above reasons with regard to

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independent Claim 18. At the very least, any disagreement with Applicant's arguments should be made only in a non-final action that clearly relates elements of Elliott with Applicant's claim limitations, so that Applicant has a fair opportunity to respond.

CONCLUSION

In view of the foregoing remarks, Applicants believe that this response has responded fully to the concerns expressed in the FOA and that each of the pending claims is in condition for immediate allowance. Accordingly, the Examiner is respectfully requested to pass this application to issue. If, in the opinion of the Examiner, a telephone conference/would expedite the prosecution of this application, the Examiner is invited to call the undersigned attorney at the telephone number listed below.

Dated: May 24, 2006

Respectfully submitted,

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